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June 17, 1998

Hon. Magalie Roman Salas
Secretary
Federal Communications
Commission
1919 M Street, N.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION

Re: Association for Local Telecommunications Services
Petition for Declaratory Ruling Regarding Section 706
CC Docket No. 98-78

Dear Secretary Salas:

The New York Department of Public Service (NYDPS) responds to the petition for a declaratory ruling filed by the Association for Local Telecommunication Services (ALTS). The ALTS petition requests the Commission to: (1) declare that the interconnection, collocation, unbundling and resale requirements of §§ 251, 252 and 271 are applicable to digital and broadband networks; and (2) establish new rules and regulations for collocation.

This petition raises important policy considerations for balancing the need of new entrants for access to the local loop against the need to encourage investments in advanced technologies. As we indicated in our comments to the Bell Atlantic, U.S. West and Ameritech § 706 petitions (CC Dockets 98-11, 98-26 and 98-32), it is important to ensure that potential competitors have viable access to the local loop. Also, we continue to believe that the deployment of advanced telecommunications networks should be encouraged.

Pursuant to §706 of the Act, the Commission has the opportunity to explore fully the range of policy options and market consequences related to advanced technologies. The Commission, therefore, should defer action on the ALTS' and Regional Bell Operating Companies' petitions and establish a proceeding to examine and resolve these very important and complicated issues. We welcome the opportunity to work with the Commission and interested parties to fashion a solution that best

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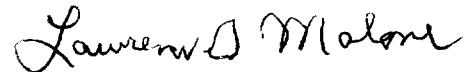
Hon. M. R. Salas

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June 17, 1998

promotes advanced technologies and the Act's pro-competitive policies.

Sincerely,

A handwritten signature in cursive script that reads "Lawrence G. Malone".

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